

**CSReeder, PC**  
TRIAL LAWYERS AND GENERAL COUNSEL

December 7, 2022

The Honorable Sarah Netburn  
United States Magistrate Judge  
Southern District of New York  
Thurgood Marshall Courthouse  
New York, NY 10007

Re: *Lynne Freeman v. Tracy Deebs-Elkenaney et. al.* 22 Civ 2435 (LLS)

Dear Judge Netburn:

This firm represents Plaintiff Lynne Freeman ("Plaintiff") in the above-referenced action and is submitting this letter in response to Defendants' letter of today.

Plaintiff sent her letter to the Court early this morning in response to Defendants' letter of December 5, 2022, because Defendants improperly raised and addressed several new discovery issues in their letter. Those issues should have been included in a separate letter motion to the Court. If Plaintiff did not send its letter it would not have had an opportunity to respond to the new issues raised by Defendants.

We again thank the Court for its time and attention to this matter.

Respectfully submitted,

**CSReeder, PC**



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